



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VIII

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000027599

APR 19 1994

Ref: 8HWM-FF

Mr. Richard Schassburger
U.S. Department of Energy
Rocky Flats Office
P.O. Box 928
Golden, CO 80402-0928

Re: Approval of Technical Memoranda 1
through 10, Operable Unit 5

Dear Mr. Schassburger:

EPA, as lead regulatory agency for Operable Unit 5 (OU 5), grants final approval for technical memoranda 1 through 10 (TMs 1-10), amendments to the Final Resource Conservation and Recovery Act Facility Investigation /Remedial Investigation Workplan for OU 5. The OU 5 field program was designed to allow results from preliminary field work to be incorporated into subsequent phases via the submittal, review, and approval of technical memoranda. TMs 1-10 were given verbal approval by EPA before implementation by DOE. However, in most cases, this verbal approval was not followed by a written confirmation. The intent of this letter is to document the approvals for the record.

Enclosed please find a summary of the correspondence history and resolution of issues pertaining to TMs 1-10. If you have any questions or concerns, please contact Bonnie Lavelle at (303) 294-1067.

Sincerely,

Martin Hestmark, Manager
Rocky Flats Project

Enclosure

cc: Joe Schieffelin, CDH
Jen Pepe, DOE
Ed Mast, EG&G

ADMIN RECORD



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**CORRESPONDENCE HISTORY AND RESOLUTION OF ISSUES
TECHNICAL MEMORANDA 1-10, OPERABLE UNIT 5**

Technical Memorandum 1:

On October 13, 1992, EPA granted approval for the implementation of TM 1 with the understanding that CDH will continue to research the adequacy of existing analytical methods. It was agreed that any analytical method changes deemed necessary will be incorporated into subsequent phases of the program. With no indication from CDH that changes are necessary at this time, TM 1 is approved.

Technical Memorandum 2:

EPA granted approval on September 28, 1992, on the condition that geophysical surveys be performed in the ash pit area regardless of the results of other investigations. Geophysical surveys of the ash pit area were completed as of December 28, 1992.

Technical Memorandum 3:

EPA and CDH jointly approved TM 3 with no conditions on December 28, 1992.

Technical Memorandum 4:

EPA granted final approval on May 26, 1993, after determining that the final document met the conditions for approval stated in EPA's April 13, 1993, letter.

Technical Memorandum 5:

EPA granted approval on January 25, 1993, on the condition that CDH's concerns regarding the grid configuration of soil gas sampling points downgradient of the landfill be modified to provide more complete coverage and that the definition of anomaly be revised. The sampling grid was changed to satisfy CDH's concerns and the definition of anomaly was modified. CDH recommended final approval on March 12, 1993.

Technical Memorandum 6:

EPA granted approval on February 4, 1993, on the condition that the concerns raised by CDH in their February 3, 1993, letter be adequately addressed. These concerns included the spacing for the CPT surveys, and the prioritization of sample analysis.

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The final version of TM 6, transmitted on April 6, 1993, reflects a 100 foot spacing of CPT probes and the prioritization of samples as requested by CDH.

Technical Memorandum 7:

EPA granted approval on February 23, 1993, on the condition that the concerns raised by CDH in their February 19, 1993, letter be adequately addressed. The final version of TM 7, transmitted on March 15, 1993, contains a responsiveness summary documenting that all EPA and CDH comments were accepted by DOE and the document was revised accordingly.

Technical Memorandum 8:

By mutual agreement among all three parties, TM 8 consists of two separate letters. The first, dated May 23, 1993, describes the investigation of soil gas anomalies at the landfill by installing boreholes and well points in the locations of the highest soil gas readings. The second, dated June 18, 1993, describes the installation of monitoring wells downgradient of the landfill. These activities were discussed at a project update meeting on May 14, 1993, where the agencies gave DOE verbal approval to implement the proposal.

Technical Memorandum 9:

In a letter dated May 17, 1993, CDH raised the concerns that additional information regarding the exploratory boreholes be included in the TM as well as a contour map of the bedrock surface. These items were included in the final version of the TM, transmitted on June 22, 1993. Both regulatory agencies were also concerned that the number of monitoring wells be chosen based on the objective of the study and not be limited to a fixed number determined at the time of the original workplan development. Four monitoring wells and their locations were agreed upon by all three parties in a series of telephone conversations during May and June of 1993.

Technical Memorandum 10:

EPA verbally expressed the concern that the original investigation program was drastically decreased as a result of preliminary investigations. The final version of TM 10, transmitted April 7, 1993, contains a commitment by DOE to undertake additional subsurface investigation in the event that contamination is detected in any of the proposed boreholes or in the event that radiation anomalies are detected during the fidler survey. DOE also added a two foot composite sample at EPA's request.